

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

04-344

In the Matter Of

MariTEL, Inc. Proposal to Serve As
Automatic Identification System (AIS)
Frequency Coordinator

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DA 03-3669

OCT 29 2004

Federal Communications Commission
Office of the Secretary

COMMENTS OF THOMAS W. TITTLE

Thomas W. Tittle d/b/a Burns Harbor Radio ("Tittle"), by his attorney and pursuant to the invitation by the Federal Communications Commission ("FCC" or "Commission") in its Public Notice issued on November 19, 2003 (DA 03-3669), hereby files comments regarding the petition filed by MariTEL, Inc. (Maritel) proposing that it be designated as the frequency coordinator for Automatic Identification System (AIS) channels.

Tittle is the licensee of site-based VHF public coast stations at Michigan City, Indiana (call sign KLU757) on frequency 161.850 MHz; Portage, Indiana (call sign KQU578) on frequency 162.000 MHz, and Gary, Indiana (call sign WQB676) on frequency 161.800 MHz. These stations provide public correspondence communications service to U.S. and foreign vessels on Lake Michigan. The working frequency of Tittle's station at Portage, Indiana falls between the two frequencies that NTIA has petitioned the FCC to use for AIS on a nationwide basis.


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Maritel's has filed comments opposing the NTIA petition¹ to designate channels 87B and 88B for AIS. Tittle has filed reply comments expressing concern over NTIA failure to address potential interference from AIS operations to incumbent public coast stations. In this related proceeding, Meritel has filed a proposal in which it states that it would support the NTIA plan under certain conditions, including (1) the Commission designate Maritel as the exclusive AIS frequency coordinator; (2) the Commission eliminate Maritel's coast station coverage requirements because of its inability to provide services where there are simplex AIS operations on channels 87B and 88B; (3) the Coast Guard provide Maritel with real-time access to AIS data to provision information and vessel location services to both private and non-federal government entities; and (4) the Commission promulgate rules clarifying the land/water line of demarcation where channels 87B and 88B need not be reserved for AIS operations.

Tittle has no objection to the designation of Maritel as AIS frequency coordinator, with the stipulation that any frequency recommendations for AIS stations must take into account and protect the operations of all existing site-based VHF public coast station, and not simply protect Maritel's existing and proposed stations. Furthermore, Tittle continues to believe that the Commission should create rules protecting incumbent public coast stations from AIS interference.

Respectfully Submitted,

THOMAS W. TITTLE

By  ^{aws}
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Dated: December 12, 2003

¹ Letter dated October 24, 2003 from Fredrick R. Wentland, Associate Administrator, Office of Spectrum Management, NTIA to John Muleta, chief, Wireless Telecommunications Bureau, RM-10821.

CERTIFICATE OF SERVICE

I, Douglas W. Everette, hereby certify that I am an attorney with the law firm of Blooston, Mordkofsky, Dickens, Duffy & Prendergast, and that copies of the foregoing Comments were served by hand delivery on this 12th day of December, 2003 to the persons listed below:

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